

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

| | | |
|--|---|----------------------------------|
| IN RE AMERICAN INTERNATIONAL GROUP, INC. 2008 SECURITIES LITIGATION | : | No. 08 CV 4772 (LTS) (DCF) |
| | : | CONFIDENTIAL FILED UNDER SEAL |
| | : | |
| | : | ORAL ARGUMENT REQUESTED |
| | : | |
| | : | EVIDENTIARY HEARING REQUESTED |

-----X

**NOTICE OF AIG'S MOTION TO EXCLUDE
THE DECLARATIONS, TESTIMONY AND OPINIONS OF
LEAD PLAINTIFF'S EXPERT DR. STEVEN P. FEINSTEIN**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law and declaration of Joseph S. Allerhand, Defendant American International Group, Inc. ("AIG") will move this Court, before the Honorable Laura T. Swain, United States District Judge, United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Room 755, New York, New York 10007, on a date and at a time to be set by the Court, for an order pursuant to Rules 403 and 702 of the Federal Rules of Evidence excluding (i) the Declaration of Steven P. Feinstein dated April 1, 2011 ("Feinstein Declaration") and the Reply Declaration of Steven P. Feinstein dated December 16, 2011 ("Feinstein Reply Declaration") (collectively the "Feinstein Declarations"), (ii) Dr. Feinstein's testimony on the subjects addressed in the Feinstein Declarations, and (iii) all evidence that is based upon, or directly or indirectly references the Feinstein Declarations or Dr. Feinstein's testimony or the subjects addressed in the Feinstein Declarations and Dr. Feinstein's testimony.

The undersigned counsel certifies, pursuant to Rule 2(B) of Judge Swain's Individual Practices Rules, that AIG used its best efforts to resolve informally the matters raised in this submission. These efforts were unsuccessful. Further, Lead Plaintiff has informed AIG's counsel that it reserves the right to object to the motion.

Dated: New York, New York
May 24, 2012

WEIL, GOTSHAL & MANGES LLP

By: /s/ Joseph S. Allerhand
Joseph S. Allerhand
Robert F. Carangelo
Stacy Nettleton
Kathleen E. Murphy
767 Fifth Avenue
New York, NY 10153
(212) 310-8000

*Attorneys for American International
Group, Inc.*

To:

Leonard Barrack
Jeffrey W. Golan
M. Richard Komins
Robert A. Hoffman
Jeffery B. Gittleman
BARRACK, RODOS & BACINE
Two Commerce Square
2001 Market Street
Suite 3300
Philadelphia, PA 19103
Tel: (215) 963-0600
Fax: (215) 963-0838
lbarrack@barrack.com
jgolan@barrack.com
mkomins@barrack.com
rhoffman@barrack.com
jgittleman@barrack.com

A. Arnold Gershon
Regina M. Calcaterra
425 Park Avenue
Suite 3100
New York, NY 10022
Tel: (212) 688-0782
agershon@barrack.com
rcalcaterra@barrack.com

Co-Lead Counsel for Lead Plaintiff

E. Powell Miller
Marc L. Newman
THE MILLER LAW FIRM
Miller Building
950 West University Drive
Suite 300
Rochester, MI 48307
Tel: (248) 841-2200
Fax: (248) 652-2852
epm@millerlawpc.com
mln@millerlawpc.com

Co-Lead Counsel for Lead Plaintiff

cc: All Defense Counsel